

United States District Court
Eastern District of Wisconsin

FILED

10 FEB -5 PM 57

JON W. SANFILIPPO
CLERK

10-C-0102

ELVIS NATHANIEL Williams

(Full Name of Plaintiff or Plaintiffs)

vs

DR. KERN REID M.D.

DR. JULIA USATINSKY, M.D.

ERICKA SINCLAIR

(Full Name of Defendant or Defendants)

No.

(Supplied by Clerk)

COMPLAINT

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court relating to the same occurrence involved in this action?

☐ YES

☒ NO

B. Have you begun other lawsuits in state or federal court?

☐ YES

☒ NO

C. If your answer to A or B was YES, provide the requested information below. If there is more than one lawsuit, describe each additional one on a separate sheet of paper, using the same outline.

1. Parties to the previous lawsuit

Plaintiff(s)

Defendant(s)

2. Court in which lawsuit brought (if federal court, name district: if state court, name the county)

3. Docket number _____
4. Current status (for example: Was the case dismissed? Was it appealed? Is it still pending)? _____
5. Approximate date of filing lawsuit _____
6. Approximate date of disposition _____

II. PARTIES

A. Your name (PLAINTIFF) ELVIS N. WILLIAMS

B. Your Address 2577 NO 15th ST MILWAUKEE WI 53206

(If there is more than one plaintiff, use the margin for extra space if you need it. List the address only if it is different from the address listed above).

C. DEFENDANT (name) DR. KERN REID M.D.

D. Defendants address 1020 NO. 12th ST MILWAUKEE WI 53233

E. Additional DEFENDANTS (names and addresses) DR JULIA USATINSKY
ERICKA SINCLAIR 1020 NO 12th ST MILWAUKEE WI
53233

III. STATEMENT OF CLAIM (follow instructions carefully)

State briefly as possible the *essential facts* of your case. Tell what each defendant did to you that caused you to file this suit against them. If you are complaining about more than one wrong, use a separate **numbered** paragraph for each wrong, and describe each wrong in that paragraph and only that paragraph. State only the facts. *Do not give any legal theories or arguments, do not cite any cases or statutes. Do not feel you have to use all the space.* USE NO MORE THAN THE SPACE PROVIDED. THE COURT STRONGLY DISAPPROVES OF STATING CLAIMS OUTSIDE THE SPACE PROVIDED.

Begin statement of claim: ON 9-1-2009 I WAS SCHEDULED AN APPOINTMENT TO SEE DR USATINSKY REGARDING A CHANGE IN MY MEDICATION. AT THE TIME OF THE APPOINTMENT I WAS TOLD DR USATINSKY WAS OUT ON MATERNITY LEAVE. AND THAT I WOULD BE SEEN BY DR TAHA MOHAMMED ON 9-1-09 I INFORMED DR MOHAMMED THAT THE HYDROCODONE 10/650 WAS CAUSING ME TO ITCH AND I FELT THAT WAS A MAJOR DISCOMFORT TO ME. I WAS UNABLE TO REST DAY OR NIGHT DUE TO THIS DISCOMFORT. DURING MY VISIT WITH DR MOHAMMED I EXPRESSED TO HIM THE STATUS OF MY ILLNESS (FIBROMYALGIA) AND HOW IT AFFECTS MY ABILITIES TO MAINTAIN MY ACTIVITIES ON A DAILY BASIS. THERE ARE DAYS WHEN I CANT TOUCH MY SKIN OR MOVE IN THE BED, NOR ABLE TO GET OUT OF BED. DUE TO THE ITCHING DR MOHAMMED CHANGED MY MEDICATION TO OXYCODAPAP 5-325mg. AT THAT TIME MY DOSEAGE OF MEDICATION HAD BEEN CUT FROM 120 PILLS TO 50 PILLS FOR A MONTH. THIS NOW SHORTEN ME 10 DAYS OF MEDICATION FOR PAIN. ON 10-2-09 I WAS GIVEN THE SAME REFILL BY DR MAHBOOB, HINA. ON 10-14-09 I CALLED FOR A REFILL ON THE OXYCOD 5-325 I WAS TOLD BY THE PHARMACIST THAT IT WAS TOO SOON FOR A REFILL. I TRIED TO EXPLAIN TO THE PHARMACIST THAT MY MEDICATION HAD BEEN CUT BY 70 PILLS, SHE STATED I NEEDED TO TALK TO MY DOCTOR. ON 10-20-09 I WAS SEEN BY A STUDENT DOCTOR BY THE NAME OF DR ATHAR SAEED. I ASKED FOR A REFILL OF MY MEDICATION AND THAT I NEEDED SOMETHING A LITTLE BIT STRONGER, DUE TO THE WEAKNESS OF

STATEMENT OF CLAIM CONTINUED

Oxycodone 5-325mg. Dr Speed stated to me that Dr Reid had to write the prescription. When Dr Reid came in to see me, he stated to me that pain medication doesn't help control or treat fibromyalgia. I stated to Dr Reid I will try anything to ease the discomfort I was in. I need relief at that moment. Dr Reid suggested that I take Lyrica which is a treatment for fibromyalgia. I went downstairs to the Pharmacy and got it filled. Upon arriving home I went to take the medication and read the side effects. Right then I knew I couldn't take the Lyrica due to the side effect that causes suicidal behavior. I have a history of suicidal attempts. I'm a high risk for suicidal acts. On 10-21-09 I returned the medication back to the doctor. I was told I needed an appointment to see the doctor. I was in so much pain at that time, knowing I had no medication in about 6 days. I left went home and called the Hospital Administrator and explain my causes. On 10-22-09 the Administrator office called me and told me that they called over to the Internal Medicine Clinic and requested my medication. I did not know that the Internal Medicine Clinic had its own Administrator. Nor was I told whom I could talk to about the way I was being treated at the clinic. On 10-23 I was called and told my

STATEMENT OF CLAIM CONTINUED

prescription was ready signed by DR Reid. ON 11-17-09 I went to see DR Saeed for another refill on my pain medication. After DR Saeed examined me then DR Reid came in the room. DR Reid stated to me I don't like anyone consulting my boss and that he felt I was wrong. DR Reid also stated to me that he gave me Lyrica to take and that's what I should have tried. I informed DR Reid at that time that I could not take the Lyrica due to the suicidal affect that it would have on me. After explaining to DR Reid my history of suicidal attempts DR Reid stated don't let this happen again. When I arrived home I immediately called Isaac Coggs Clinic and scheduled an appointment to see my old physician DR Szekley. My appointment was on 11-25-09. I was also given a referral on 10-20 to see a pain management specialist, signed by DR Saeed. ON 11-13-09 upon arrival to see the pain management doctor DR Sadighi I was told there was no referral for me and that I had been seen by DR Dogra at this same clinic some time back. I had to see him and not DR Sadighi. I called JOANNA at I CARE which she is my coordinator. JOANNA also spoke with the nurse. Upon arriving back at home I called and got an appointment to see DR Dogra on 12-14-09.

END STATEMENT OF CLAIM

STATEMENT OF CLAIM CONTINUED

I WENT BACK AND SAW DR SAEED FOR PAIN MEDICATION ON 11-17-09. DR SAEED REFUSE PERSCRIPTIONING ME ANY PAIN MEDICATION. I WAS AGAIN IN SO MUCH PAIN I LEFT AND WALKED OVER TO THE HOSPITAL ADMINISTRATORS OFFICE, ASKING TO SPEAK TO THE ADMINISTRATOR. I SPOKE WITH NICOLE, SHE MADE A CALL AND TOLD ME TO GO BACK OVER AND PICK UP MY PERSCRIPTION OF PAIN MEDICATION. ST. 11 ONLY 50 PILLS. DR REID NEVER INCREASED THE DOSEAGE. ON 12-14-09 I ARRIVED AT DR DOGRA OFFICE FOR MY APPOINTMENT. WHEN DR DOGRA CAME IN THE ROOM HE STATED WHY ARE YOU HERE? I EXPLAIN THAT I WAS ASKED TO SEE HIM TO OBTAIN PAIN MEDICATION FOR MY LEFT KNEE AND FIBROMYALGIA. DR DOGRA STATED TO ME THAT HE ONLY GIVE INJECTIONS AND THAT HE DIDN'T TREAT FIBROMYALGIA AND THERE WAS NOTHING HE COULD DO FOR ME. I BECAME SICK ON 12-2-09 AND WAS RUSHED TO ST LUKE HOSPITAL ON 12-4-09. I WAS THERE UNTIL 12-10-09. ON 12-11-09 I WAS OPENING MY MAIL WHEN I CAME ACROSS A LETTER FROM INTERNAL MEDICINE CLINIC. IT WAS A CERTIFIED LETTER. MY SON HAD TO SIGN FOR IT DUE TO ME BEING IN THE HOSPITAL AT THAT TIME. THIS LETTER WAS A NOTIFICATION OF MY ~~discharge~~ discharge FROM THE CLINIC. DUE TO MY DRUG SEEKING BEHAVIORS. ON 1-14-10 I WENT TO

STATEMENT OF CLAIM CONTINUED

pick up my medication for the month. For the pharmacist I was told
that I had picked up a prescription for pain medication on 12-2-09
for Oxycodone 7.5-325mg quantity 50 pills. ordered by Dr Usafinsky
I told Phyllis that I never picked up any pills only on 12-1-09
I picked up my monthly medications. Ms Phyllis checked and
there was no signature of File where I signed for any
pills. Dr Seckley had given me some pain medication on
12-23-09 The pharmacist Mrs Chaney stated to me and Ms
Phyllis that it was signed in the book of File. I know that
I never picked up any pain pills.

END STATEMENT OF CLAIM

Neither one of those doctors know of my medical history. Now I've been placed into these computers as a drug addict. This is a false ~~accusation~~ accusation. Doctors to my knowledge are to help patients with illnesses in which you are able to function in our daily lives. This includes pain management. I've been diagnosed with multiple problems that causes me chronic pain on a daily basis. I suffered traumatically since 1995. I've been diagnosed with fibromyalgia and had a knee replacement that also causes me major pain. The only thing I was trying to accomplish from this was a refill on my medication. The only addiction I have is putting my trust into Dr. Reid and Dr. ustinsky. I'm glad to be back with a doctor that knows my medical history whom will get me the proper care necessary to function in every day life. I'm a man of God and well known in the community for my ministry outreach. I'm sorry for this and that it had to get this far. I hope my request is granted of removing ~~this~~ this false accusation out of your computers.

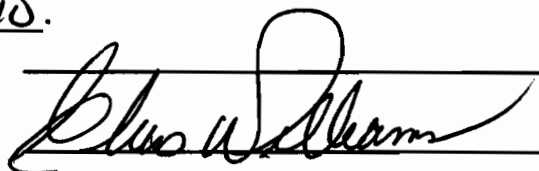
IV. RELIEF YOU REQUEST

State exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes. DO NOT USE THIS SPACE TO STATE THE FACTS OF YOUR CLAIM. USE IT ONLY TO REQUEST REMEDIES FOR THE INJURIES YOU COMPLAIN ABOUT. Use only the space provided. The court strongly disapproves of requesting remedies outside the space provided.

I would like my NAME to be removed from Auroar
Computer data base as a drug addict And be compensated
for all my pain and suffering, due to this FALSE
accusation made by these Professional healthcare
providers. I'm suing in the sum of 1.2 million dollars
or settle out of court a reasonable amount.

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this February day of 4th, 2010.



(Signature of Plaintiff(s))